

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JANE DOE,)	
)	No. 1:17-cv-03688
Plaintiff,)	
v.)	Judge: Hon. John Robert Blakey
)	
HARPERCOLLINS PUBLISHERS LLC and)	Magistrate Judge: Hon. Sheila
LAURA KIPNIS,)	Finnegan
)	
Defendants.)	
)	

JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER

Plaintiff Jane Doe (“Plaintiff”) and Defendants Harper Collins Publishers (“HarperCollins”) and Laura Kipnis (“Kipnis”), by their respective attorneys and pursuant to Federal Rule of Civil Procedure 26(c), hereby move for entry of the proposed Agreed Protective Order attached hereto as **Exhibit A** and submitted to the Court pursuant to its Case Procedures. In support of their Motion, the parties state as follows:

1. Through written discovery, Plaintiff has requested that HarperCollins and Kipnis produce certain documents and information that HarperCollins considers to be confidential and/or proprietary in nature, including related to HarperCollins’s insurance coverage and documents concerning Plaintiff, who is proceeding pseudonymously in this action. HarperCollins and Kipnis have also requested that Plaintiff produce certain documents that Plaintiff considers to be confidential, including her medical records, counseling records, and personal financial information. The parties desire to maintain the confidentiality of such documents and information through a protective order.

2. Pursuant to Local Rule 26.2 and the Court's Case Procedures, attached hereto as **Exhibit B** is a redline indicating the Agreed Protective Order's changes from the Court's Model Confidentiality Order. Given the Plaintiff's pseudonymous status in this case, the Court's Model Confidentiality Order has been modified to address documents that Plaintiff considers confidential because her name appears in them. (*See* § 7.) The parties have also made a change to the Model Confidentiality Order to reflect their agreement that documents subject to the Agreed Protective Order are to be destroyed, rather than returned, at the end of litigation. (*See* § 14(b).)

3. The proposed Agreed Protective Order and redline will also be submitted to Proposed_Order_Blakey@ilnd.uscourts.gov in accordance with the Court's Case Procedures.

4. Counsel for all parties have approved the text of the proposed Agreed Protective Order.

WHEREFORE, the Jane Doe, HarperCollins Publishers LLC, and Laura Kipnis respectfully request that this Court enter the Agreed Protective Order.

Date: May 21, 2018

Respectfully Submitted,

For Plaintiff:

For Defendants:

*/s/ Jennifer B. Salvatore (with
permission)*

/s/ Lauren J. Caisman

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CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of May 2018, a true and correct copy of the above and foregoing was sent via the Court's CM/ECF System to all counsel of record.

/s/ Lauren J. Caisman
Attorney for Defendants